

FOLEY & LARDNER LLP
ATTORNEYS AT LAW
ONE MARITIME PLAZA, SIXTH FLOOR
SAN FRANCISCO, CA 94111-3409
TELEPHONE: 415.434.4484
FACSIMILE: 415.434.4507

EILEEN R. RIDLEY, CA BAR NO. 151735
E-MAIL: ERIDLEY@FOLEY.COM
JASON M. JULIAN, CA BAR NO. 215342
E-MAIL: JJULIAN@FOLEY.COM
ONE MARITIME PLAZA, SIXTH FLOOR
SAN FRANCISCO, CA 94111-3409
TELEPHONE: 415.434.4484
FACSIMILE: 415.434.4507

ATTORNEYS FOR PLAINTIFF GIA-GMI, LLC AND THIRD PARTY DEFENDANT J. RICHARD BLANKENSHIP

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

GIA-GMI, LLC, a Florida Limited
Liability Company,

Plaintiffs,

v.

DANIEL R. MICHENER, et al.,

Defendants.

DANIEL R. MICHENER, an individual,
JAMES M. MCWALTERS, an individual,

Third-Party Plaintiffs,

v.

J. RICHARD BLANKENSHIP

Third-Party Defendant.

Case No. C 06-7949 SBA

**STIPULATED REQUEST AND
~~PROPOSED~~ ORDER TO EXTEND
DEADLINE TO REOPEN CASE TO
DECEMBER 4, 2007**

**The Honorable Sandra Brown
Armstrong**

On October 3, 2007, this Court issued an order stating that, if settlement is not reached, any party may move to reopen the above-captioned case by motion filed no later than forty-five (45) days after the date of the order. That deadline is November 19, 2007. The parties are still finalizing settlement documentation in this matter, and agree that additional time is needed to complete the settlement documentation. As such, pursuant to Civil L.R. 6-2(a) and 7-12, Plaintiff GIA-GMI, LLC, Third Party Defendant J. Richard Blankenship, and Defendants and

1 Third-Party Plaintiffs Daniel R. Michener and James M. McWalters, and Defendants Charles D.
2 Toy, Allan M. Dunn, Larry J. Austin, W. Denman Van Ness, Michael P. Salucci, Computer and
3 Software Enterprises, Inc., Pangea Holdings, LLC, and Pangea Trading Corporation, through
4 their respective undersigned counsel, hereby stipulate that the deadline for filing a motion to
5 reopen the above-captioned case be extended from November 19, 2007 to **December 4, 2007**.

6
7 DATED: November 13, 2007

GOODIN, MACBRIDE, SQUERI, RITCHIE & DAY
LLP

8
9
10 By: /s/Francine T. Radford

11 FRANCINE T. RADFORD
12 Attorneys for Defendants and Third-Party
13 Plaintiffs Daniel R. Michener and James M.
14 McWalters, and Defendants Charles D. Toy,
Allan M. Dunn, Larry J. Austin, W. Denman
Van Ness, Michael P. Salucci, Computer and
Software Enterprises, Inc., Pangea Holdings,
LLC, and Pangea Trading Corporation

15 DATED: November 13, 2007

FOLEY & LARDNER LLP

16
17 By: s/Eileen R. Ridley

18 EILEEN R. RIDLEY
19 Attorneys for Plaintiff GIA-GMI, LLC, and
20 Third Party Defendant J. Richard Blankenship

21 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

22 DATED: 11/15/07

23 
24 HONORABLE SAUNDRA BROWN
25 ARMSTRONG
26
27
28